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June 19, 2018

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC  
for Approval of CRPE Queue Number Proposal, Limited Waiver of  
Generator Interconnection Procedures, and Request for Expedited Review  
**Docket No. 2018-\_\_-E**

Dear Ms. Boyd:

Pursuant to 10 S.C. Code Reg. 103-825 (2012) of the Rules of Practice and Procedures of the Public Service Commission of South Carolina, please find enclosed for filing the Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of CRPE Queue Number Proposal, Limited Waiver of Generator Interconnection Procedures, and Request for Expedited Review.

Should you have any questions regarding this matter, please do not hesitate to contact me at 803.988.7130.

Sincerely,

Rebecca J. Dulin

Enclosures

cc: Ms. Dawn Hipp, Office of Regulatory Staff  
Mr. Andrew Bateman, Office of Regulatory Staff

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2018-[ ]-E**

**In Re:**

<b>Duke Energy Carolinas, LLC and Duke Energy Progress, LLC</b>	) ) ) ) ) ) )	<b>PETITION OF DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC FOR APPROVAL OF CPRE QUEUE NUMBER PROPOSAL, LIMITED WAIVERS OF GENERATOR INTERCONNECTION PROCEDURES, AND REQUEST FOR EXPEDITED REVIEW</b>
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Pursuant to 10 S.C. Code Reg. 103-825 (2012), of the Rules of Practice and Procedures of the Public Service Commission of South Carolina (“Commission”), Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and, together with DEC, the “Duke Utilities”), by and through counsel, hereby petition the Commission for approvals related to the processing of Interconnection Requests for Interconnection Customers that elect to participate in the upcoming Competitive Procurement of Renewable Energy Program (“CPRE Program”) request for proposal solicitation (“RFP”) process.

As part of this request, the Duke Utilities request limited waiver of certain provisions of the South Carolina Generator Interconnection Procedures, Forms and Agreements (“SC GIP”) as adopted in Docket No. 2015-362-E<sup>1</sup> to effectuate the proposal described herein. The Duke Utilities are making these requests with the purpose of providing developers of utility-scale solar generating facilities in South Carolina (“SC Solar Generators”) an equal opportunity to participate in the Duke Utilities’ upcoming CPRE Program RFP process. Importantly, the relief requested herein will apply only to Interconnection Customers that voluntarily submit a proposal

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<sup>1</sup> Terms not defined in this Petition shall have the meaning set forth in Attachment 1 – Glossary of Terms of the SC GIP.

to participate in the CPRE Program. Interconnection Customers that elect not to participate in the CPRE Program will therefore not be affected by this request. In addition, these proposals will not affect the Commission's jurisdiction over Interconnection Requests, which will continue to apply to those Interconnection Requests that are processed through the CPRE Program approach discussed herein.

Because of the timing of the RFP process for the CPRE Program, the Duke Utilities respectfully request that the Commission address this Petition on an expedited basis. The first RFP is expected to be issued on July 10, 2018, and it is anticipated that responses to the RFP will be due on September 10, 2018. The Duke Utilities believe that it will be helpful to the SC Solar Generators that are interested in participating in the RFP process to know as soon as possible if this Commission will approve of the requests being made in this Petition.

In support of this Petition, the Duke Utilities show the Commission the following:

**I. Name and Address of the Duke Utilities**

1. The correct name and post office address of DEC is Duke Energy Carolinas, LLC, Post Office Box 1321, Charlotte, North Carolina 28201.
2. The correct name and post office address of DEP is Duke Energy Progress, LLC, Post Office Box 1551, Raleigh, North Carolina 27602.

**II. Notices and Communications**

3. The names and addresses of the attorneys for the Duke Utilities who are authorized to receive notices and communications with respect to this Petition are:

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### **III. Description of the Duke Utilities**

4. DEC is engaged in the generation, transmission, distribution, and sale of electric energy at retail in the central and western portions of North Carolina and the western portion of South Carolina. DEC also sells electricity at wholesale to municipal, cooperative, and investor-owned electric utilities, and its wholesale sales are subject to the jurisdiction of the Federal Energy Regulatory Commission (“FERC”). DEC is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEC also is authorized to transact business in the State of North Carolina and is a public utility under the laws of that state. Accordingly, its operations in North Carolina are subject to the jurisdiction of the North Carolina Utilities Commission (“NCUC”).

5. DEP is engaged in the generation, transmission, distribution, and sale of electric energy at retail in portions of western, central, and eastern North Carolina and the eastern portion of South Carolina. DEP also sells electricity at wholesale to municipal, cooperative, and investor-owned electric utilities, and its wholesale sales are subject to FERC jurisdiction. DEP is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEP also is authorized to transact

business in the State of North Carolina and is a public utility under the laws of that state. Accordingly, its operations in North Carolina are subject to the jurisdiction of the NCUC.

#### IV. Introduction

6. On April 26, 2016, the Commission issued its *Order Adopting Interconnection Standard and Supplemental Provisions* (“2016 Order”),<sup>2</sup> approving the SC GIP, which contains updated procedures and agreements for interconnecting generating facilities to the DEC and DEPelectric systems. Pursuant to the SC GIP, the Commission exercises its jurisdiction over state-jurisdictional interconnections of generating facilities up to 80 MW<sub>AC</sub>.

7. The Duke Utilities support continued implementation of the currently-approved SC GIP and will continue to diligently process all Interconnection Requests pursuant to the SC GIP. The Duke Utilities are filing this Petition to obtain unique, limited relief in order to allow SC Solar Generator developers to effectively participate in the upcoming competitive RFP solicitation of the CPRE Program enacted into law on July 27, 2017, by North Carolina Session Law 2017-192 (“NC HB 589”). Specifically, the Duke Utilities request Commission approval to establish, for each competitive RFP solicitation to be held as part of the CPRE Program, a Queue Position based on a “CPRE Queue Number” for SC Solar Generator Interconnection Customers that elect to submit proposals into those solicitations and thereby voluntarily agree to be “grouped” for study with all other Interconnection Customers in both South Carolina and North Carolina that elect to submit bids. As further discussed in this Petition, Commission approval of the CPRE Queue Number proposal will allow the Duke Utilities to properly administer the

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<sup>2</sup> *In re: Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard*, Order No. 2016-191, Docket No. 2015-362-E (April 26, 2016) (“SC GIP Order”).

CPRE Program for the benefit of SC Solar Generator developers in the same manner as North Carolina developers.

8. To effectuate the Duke Utilities' proposal to establish CPRE Queue Numbers, DEC and DEP are also requesting limited waivers of certain SC GIP requirements related to establishing Queue Numbers and processing individual Interconnection Requests, as further described herein. As stated above, the CPRE Queue Number proposal and SC GIP waivers requested herein will apply only to Interconnection Customers who voluntarily participate in the CPRE Program. Interconnection Customers that elect not to participate in the CPRE Program will not be affected by approval of these requests and their Interconnection Requests will be processed pursuant to the currently approved SC GIP without modification.

## **V. Overview of the CPRE Program**

9. NC HB 589 is comprehensive renewable energy legislation aimed at promoting a smarter, more sustainable approach to cost-effectively procuring and reliably integrating solar energy for customers across the Duke Utilities' systems or "balancing authority areas" through implementation of the CPRE Program.<sup>3</sup> Specifically, Section II of this legislation enacted N.C. Gen. Stat. § 62-110.8, which mandates DEC and DEP to competitively procure 2,660 MW of renewable energy in aggregate between their North Carolina and South Carolina jurisdictional territories through an independently administered RFP solicitation process over a forty-five (45) month period.<sup>4</sup> The CPRE Program also allows the Duke Utilities to identify the geographic locations that will permit the most cost-effective integration of new renewable energy resources, and to allocate the total procurement amount between DEC's and DEP's respective balancing

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<sup>3</sup> See N.C. Gen. Stat. § 62-110.8(c) (2017).

<sup>4</sup> N.C. Gen. Stat. § 62-110.8(a) (2017). The 2,660 MW procurement mandate would be adjusted if solar and other renewable generators within the DEC and DEP balancing authority areas that are not subject to economic dispatch or curtailment exceed 3,500 MW prior to the end of the initial 45-month competitive procurement period. See N.C. Gen. Stat. § 62-110.8(b)(1) (2017).

authority areas, “whether located inside or outside the geographic boundaries of [North Carolina.]”<sup>5</sup> thereby facilitating diversified siting of renewable resources throughout North Carolina and South Carolina. Because the CPRE competitive procurement may include facilities that are directly interconnected to the DEC and DEP systems outside of North Carolina, SC Solar Generators will be able to participate in the CPRE RFP process.

10. In order to comply with the NC HB 589 mandate, the Duke Utilities plan to initially procure approximately 600 MW in DEC and up to 80 MW in DEP during the first CPRE Program RFP solicitation.<sup>6</sup> In total, the Duke Utilities plan to issue four CPRE RFP solicitations over the 45-month CPRE Program period, each of which will be independently managed by an NCUC-approved Independent Administrator (“IA”) rather than the utility.<sup>7</sup> Each CPRE RFP solicitation will include an evaluation period during which, first, the IA ranks the combination of the most cost-effective proposals to meet the solicited procurement amounts in DEC’s and DEP’s respective jurisdictions.<sup>8</sup> After the IA completes the ranking process, the Duke Utilities evaluate proposals in the order ranked by the IA for potential Upgrades to their systems that would be required to safely and reliably interconnect the proposed facilities. Those Upgrade costs are then provided to the IA in order to determine whether the cost of Upgrades for any proposed generating facility affects the initial ranking and makes a project no longer the most

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<sup>5</sup> N.C. Gen. Stat. § 62-110.8(c) (“[s]ubject to the aggregate competitive procurement requirements established by this section, the electric public utilities shall have the authority to determine the location and allocated amount of the competitive procurement within their respective balancing authority areas, whether located inside or outside the geographic boundaries of [North Carolina].”).

<sup>6</sup> See *Petition for Approval of Competitive procurement of Renewable energy Program to Implement N.C. Gen. Stat. § 62-110.8*, Attachment 1, CPRE Program Guidelines, Section 1.3, at 1, NCUC Docket Nos. E-2, Sub 1159, E-7 Sub 1156 (Nov. 27, 2017) (“CPRE Program Guidelines”). The CPRE Program Guidelines were approved by the NCUC on February 21, 2018, in NCUC Docket Nos. E-2, Sub 1159, E-7, Sub 1156 (“CPRE Program Order”).

<sup>7</sup> See *Order Approving the Independent Administrator of the CPRE Program*, NCUC Docket No. E-100, Sub 151 (Jan. 9, 2018).

<sup>8</sup> CPRE Program Guidelines, Sections 4.2, 4.3 and 4.4, at 9-11.

cost-effective resource to meet the solicited need (as determined by the IA).<sup>9</sup> Once this second step is complete, the Duke Utilities select bid proposals in the order ranked by the IA, PPAs are executed, and the selected proposals proceed to complete the interconnection process.<sup>10</sup>

11. To be considered an eligible participant to bid into a CPRE RFP, a developer sponsoring a CPRE proposal will be required to submit an Interconnection Request under the developer's respective state's interconnection procedures on or before the CPRE RFP proposal due date, and otherwise comply with the CPRE Program Guidelines.<sup>11</sup> As in North Carolina, SC Solar Generator developers can bid proposals into the CPRE RFP and, if their proposals offer the most competitively-priced renewable energy resource option as determined by the IA, be selected to enter into 20-year competitively-priced PPAs with DEC or DEP.

#### **VI. Need For Relief to Implement CPRE RFP within Current South Carolina Interconnection Process**

12. The main objective of the CPRE Program is to obtain the most cost-effective and reliable renewable generation resources for customers, whether proposed to be sited in North Carolina or South Carolina, using a competitive solicitation process.<sup>12</sup> Given the anticipated participation of SC Solar Generators in the CPRE, and because the Duke Utilities are currently finalizing the RFP for the first CPRE solicitation for issuance in July 2018, the Duke Utilities are filing this request at this time in order to facilitate SC Solar Generators' participation in the CPRE Program RFP process. The proposals described in this Petition are designed to implement the CPRE RFP process as approved by the NCUC within the overall framework of the already-approved SC GIP. Specifically, these proposals involve adjusting the serial study process that is

<sup>9</sup> CPRE Program Guidelines, Sections 4.3 and 4.4 at 10-11.

<sup>10</sup> *Id.*

<sup>11</sup> To be a qualified market participant and move forward within the bidding process, additional market participation requirements apply. See CPRE Program Guidelines, Section 3.2, at 3. Updated guidelines and requirements will be published by the IA on its own, separate website prior to the issuance of the RFP.

<sup>12</sup> See CPRE Program Order at 23.



utilized under the current SC GIP for the limited purpose of accommodating a more coordinated and efficient grouping study evaluation, as further explained herein, of all project proposals that voluntarily bid into the CPRE Program.

13. Under the serial study process currently provided by the SC GIP, an Interconnection Customer submits an Interconnection Request to establish a Queue Number for its individual generating facility, and then proceeds through the Section 4 Interconnection Study Process (i.e. Section 4.3 System Impact Study followed by Section 4.4 Facilities Study) based on the Queue Position of its Queue Number relative to the Queue Numbers of other Interconnection Requests.<sup>13</sup> Pursuant to SC GIP Section 1.6, the Duke Utilities study each individual Interconnection Request based upon the Interconnection Customer's Queue Position.

14. Because the Duke Utilities anticipate hundreds of projects bidding thousands of megawatts of new renewable energy capacity into the CPRE RFPs, the serial process utilized under the current SC GIP would not allow DEC and DEP to efficiently identify the most cost-effective portfolio of resources that are bid into each CPRE RFP to satisfy the capacity solicited through that RFP. Because the serial process provides for the assignment of priority rights to available transmission capacity on a first-come, first-served basis, it does not contemplate a scenario like the CPRE competitive solicitation process in which, for Interconnection Customers that voluntarily elect to bid into the CPRE Program, the priority rights to available transmission capacity are assigned to the most cost-effective and reliable projects selected through the RFP, taking into account all earlier-queued Interconnection Requests that choose not to bid into the RFP.

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<sup>13</sup> This example assumes the Interconnection Request does not qualify for Section 2 (less than 20 kW) or Section 3 (Fast Track) study processes.

15. To effectively implement the CPRE RFP solicitation process, with this Petition the Duke Utilities therefore request Commission approval of a unique Queue Position approach, discussed further below, to be implemented within the framework of the current SC GIP interconnection process. This approach will facilitate SC Solar Generator Interconnection Customers' participation in the CPRE RFP process on equal footing with North Carolina Interconnection Customers, while also ensuring that other South Carolina Interconnection Customers queued ahead of the proposed CPRE projects are unaffected, and allowing the Duke Utilities to more efficiently study the proposed CPRE projects.

16. It is important to note that, due to the distinction in size and interconnection needs between generators that offer to sell to DEC and DEP through the South Carolina PURPA standard offer contract and Act 236, and the SC Solar Generators that are likely to participate in the CPRE, the relief requested in this Petition will generally not impact projects that do not participate in the CPRE RFPs. The South Carolina PURPA standard offer applies to generators sized 2 MW or less and Act 236 applies to generators sized 10 MW or less. The majority of South Carolina projects seeking to enter into PPAs with the Duke Utilities under these other frameworks thus generally interconnect to the utility's Distribution System, as opposed to the Transmission System. In contrast, the CPRE Program focuses on procuring the least-cost renewable resource up to 80 MW, the largest capacity that a facility can qualify as a small power producer under FERC's regulations,<sup>14</sup> and thereby targets larger, more cost-effective projects generally seeking interconnection to the utility's Transmission System. Due to these distinctions, the Companies anticipate that the proposed CPRE Queue Number approach and limited waivers sought for approval herein should not impact projects electing not to bid into the CPRE RFPs. The Duke Utilities plan to engage in stakeholder discussions, including with SC

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<sup>14</sup> 18 C.F.R. § 292.203(a) (2017).

Solar Generators interested in participating in the CPRE RFPs, to answer any questions regarding the implementation of the CPRE RFP solicitation within the SC GIP framework and the unique and limited requests discussed in this Petition.

**VII. Request For Approval of CPRE Queue Number Proposal and For Limited Waivers to Facilitate CPRE RFP Solicitations**

**a. CPRE Queue Number Proposal**

17. To implement the CPRE Program in a manner that allows South Carolina Interconnection Customers to effectively compete with North Carolina Interconnection Customers, the Duke Utilities request Commission approval for DEC and DEP to establish respective CPRE Queue Numbers for each CPRE RFP solicitation. For each CPRE RFP solicitation, each (DEC or DEP) CPRE Queue Number will serve as a Queue Position placeholder for Interconnection Customers that elect to participate in the RFP, while DEC or DEP, as applicable, performs clustered evaluations (“grouping studies,” discussed further below) of those CPRE bids. With this approach, the Duke Utilities can properly manage the hundreds of proposals expected to be bid into the CPRE Program and more efficiently evaluate the Transmission System Upgrades of proposals determined to be most cost competitive, without impeding non-participating Interconnection Customers’ Queue Position rights.<sup>15</sup>

18. As indicated above, DEC and DEP plan to group for interconnection study all Interconnection Customers that elect to bid proposals into the CPRE RFP solicitations based upon the Queue Position priority of the CPRE Queue Numbers. To effectuate these grouping studies within the SC GIP Section 4.3 System Impact Study process, DEC and DEP will each use its respective CPRE Queue Number assigned for a particular RFP solicitation to effectively act

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<sup>15</sup> The NCUC was already in the process of evaluating the NC Interconnection Procedures in NCUC Docket No. E-100, Sub 101 at the time that the Duke Utilities proposed the CPRE Program. Proposed revisions to the NC Interconnection Procedures pending in that proceeding include the Duke Utilities’ system impact grouping studies in order to similarly effectuate the CPRE Program interconnection study process in North Carolina.

as a “processing agent” for each Interconnection Customer that elects to bid into that RFP solicitation. The IA will then use the study results to determine the most cost-effective portfolio of proposals. Thus, in practice, because Interconnection Customers electively bidding into the CPRE RFPs choose to accept the Queue Position priority of the CPRE Queue Number, there will be no difference in Queue Position priority amongst the Interconnection Customers that bid into a particular solicitation.

19. Once the CPRE evaluation is complete and winning bids are selected by the IA, Interconnection Customers identified as the most cost-effective through the CPRE would return to the normal SC GIP System Impact Study process (as needed) and then proceed to Section 4.4 Facilities Study followed by delivery of an Interconnection Agreement under Section 5.2. Interconnection Customers not selected through the CPRE RFP process will have the option to either bid into a subsequent CPRE RFP or return to their previously established Queue Position under the SC GIP (with Queue Position priority subordinate to the projects selected through the CPRE RFP).

20. Non-participating Interconnection Customers’ projects and their respective Queue Positions will not be impacted by this CPRE Queue Number proposal, including the grouping study evaluation process. Any Interconnection Customer that does not voluntarily opt to bid into the CPRE Program will maintain its Queue Position and priority for purposes of interconnection study and assignment of Upgrades based upon their preexisting Queue Number. Nonparticipants with a Queue Number ahead of a CPRE Queue Number would proceed with System Impact Study and assignment of cost responsibly for Upgrades under SC GIP Section 1.7 ahead of the Queue Position associated with the CPRE Queue Number.

**b. Request for Limited Waiver of SC GIP to Effectuate CPRE Queue Number Proposal**

21. In order to effectuate the CPRE Queue Number and system impact grouping study approach, the Duke Utilities also request limited, necessary waivers of certain provisions of the SC GIP.

22. First, Sections 1.3.2 and 1.6 of the SC GIP provide that an Interconnection Customer's Queue Position and Queue Number are based on the original date- and time-stamp of an Interconnection Request Application Form. Because the applicable DEC or DEP CPRE Queue Number will serve as a singular placeholder Queue Position for Interconnection Customers that elect to participate in the CPRE RFPs, and Queue Position and Queue Number for CPRE RFP participants will not depend on the date- and time-stamp of the Interconnection Request, the Duke Utilities request waiver of these sections for those Interconnection Customers that elect to participate in the CPRE. As discussed above, Queue Position priority and cost responsibility for upgrades within each CPRE RFP will be determined based upon the projects identified by the IA as most competitive through the RFP. Interconnection Customers that elect not to bid into the CPRE RFPs will maintain their Queue Position priority and will not be impacted by this waiver.<sup>16</sup>

23. The Duke Utilities also request waiver of the Fast Track study process provided in Section 3 of the SC GIP for purposes of Interconnection Customers that choose to bid into the CPRE RFPs. While it is unlikely that Interconnection Requests that qualify for the Fast Track review process under Section 3 would participate in the CPRE RFPs, the Duke Utilities request waiver of this section out of an abundance of caution.

24. Waiver is also requested of the Scoping Meeting requirement contained in Section 4.2, as Interconnection Customers that participate in a CPRE RFP may proceed directly to the

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<sup>16</sup> For the avoidance of doubt, the Queue Position priority of Interconnection Customers that do elect to bid into a CPRE RFP solicitation and are not selected by the IA as most competitive will be impacted to the extent that those Interconnection Customers will thereafter be subordinate to the projects selected by the IA through the CPRE RFP.

CPRE system impact grouping study evaluation. If an Interconnection Customer is not selected through the CPRE RFP solicitation process, the Duke Utilities would agree to hold a scoping meeting upon the Interconnection Customer electing to return to the serial interconnection study process.

25. Finally, because the timing of the System Impact Study process for Interconnection Customers that participate in the CPRE RFPs will proceed according to the CPRE Guidelines and RFP requirements, waiver is also requested of the portions of Section 4.3 and the System Impact Study Agreement that relate to the timing of the System Impact Study process to the extent necessary to allow the Duke Utilities to effectuate the grouping study process described herein. Upon conclusion of the system impact grouping study for each CPRE RFP, successful bidders who proceed to Section 4.4 Facilities Study will be responsible for their proportionate share of assigned costs necessary for completing the system impact grouping studies, and will then execute a Facilities Study Agreement in accordance with the SC GIP.

26. To properly and fairly implement the CPRE Program, the Duke Utilities therefore respectfully request limited waiver from the SC GIP Sections 1.3.2, 1.6, 3, 4.2, and 4.3, and the System Impact Study Agreement as applicable to those Interconnection Customers that elect to participate in the CPRE RFP solicitations and only to the extent necessary to implement the CPRE-related proposal discussed herein.

### **VIII. Conclusion**

WHEREFORE, based on the foregoing, the Commission's approval of the Duke Utilities' unique and limited requests discussed herein will allow South Carolina Interconnection Customers developing SC Solar Generators the opportunity to participate in the CPRE RFPs on equal footing with Interconnection Customers in North Carolina, and Duke Energy Carolinas,

LLC, and Duke Energy Progress, LLC respectfully request that the Commission, pursuant to this Petition:

- (1) Consider this Petition and the relief requested herein on an expedited basis to enhance the ability of SC Solar Generators to participate in the CPRE RFP process;
- (2) Approve the Duke Utilities' proposal to use CPRE Queue Numbers to process Interconnection Requests of SC Solar Generators that elect to participate in the CPRE Program as discussed herein;
- (3) Grant the Duke Utilities limited waiver from Sections 1.6, 3, 4.2, and 4.3 of the South Carolina Generator Interconnection Procedures, Forms and Agreements and of the System Impact Study Agreement as discussed herein; and
- (4) Grant any other relief that the Commission deems appropriate.

Respectfully submitted, this 19<sup>th</sup> day of June, 2018.



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